

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA, MIAMI DIVISION
Case No. 1:23-md-03076-KMM**

IN RE:

FTX Cryptocurrency Exchange Collapse Litigation

This Document Relates To:

Chernyavsky, et al. v. Temasek Holdings (Private) Limited, et al.
Case No. 1:23-cv-22960 (S.D. Fla.)

Cabo, et al. v. Temasek Holdings (Private) Limited, et al.
No. 1:23-cv-23212 (S.D. Fla.)

**DECLARATION OF MATTHEW GRAHAM IN SUPPORT OF
DEFENDANT SINO GLOBAL CAPITAL LIMITED'S
MOTION TO DISMISS THE [CORRECTED] ADMINISTRATIVE CLASS ACTION
COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

I, MATTHEW GRAHAM, being over the age of 21, hereby declare as follows:

1. I am an authorized representative of Defendant Sino Global Capital Limited ("SG Capital Limited"). I have personal knowledge of all of the following facts and, if called as a witness, could and would competently testify thereto.

SG Capital Limited Lacks a Connection with California and Florida

2. SG Capital Limited is a Hong Kong entity.
3. SG Capital Limited is not incorporated, or registered to do business, in California.
4. SG Capital Limited does not operate, conduct, engage in, or carry on a business or any business venture in California.
5. SG Capital Limited does not maintain a place of business, office, facility, or agency in California, or otherwise have any physical operations in California.
6. SG Capital Limited does not own, use, or possess real or personal property in California.

7. SG Capital Limited does not maintain any bank accounts, post office boxes, or telephone numbers in California.
8. SG Capital Limited maintains no books or records in California.
9. None of SG Capital Limited's executives or directors is a resident of California.
10. SG Capital Limited has no connection with California arising from any action or conduct purposely directed towards California related in any way to any investments in FTX. No representative of SG Capital Limited traveled to California for the purpose of engaging in business related to investments in FTX.
11. SG Capital Limited does not regularly do or solicit business in California, or derive substantial revenue from goods used or consumed, or services rendered, in California.
12. SG Capital Limited is not incorporated, or registered to do business, in Florida.
13. SG Capital Limited does not operate, conduct, engage in, or carry on a business or any business venture in Florida.
14. SG Capital Limited does not maintain a place of business, office, facility, or agency in Florida, or otherwise have any physical operations in Florida.
15. SG Capital Limited does not own, use, or possess real or personal property in Florida.
16. SG Capital Limited does not maintain any bank accounts, post office boxes, or telephone numbers in Florida.
17. SG Capital Limited maintains no books or records in Florida.
18. None of SG Capital Limited's executives or directors is a resident of Florida.
19. SG Capital Limited has no connection with Florida arising from any action or conduct purposely directed towards Florida related in any way to any investments in FTX. No

representative of SG Capital Limited traveled to Florida for the purpose of engaging in business related to investments in FTX.

20. SG Capital Limited does not regularly do or solicit business in Florida, or derive substantial revenue from goods used or consumed, or services rendered, in Florida.

Sino Global Capital Management LLC Is Not the Agent of SG Capital Limited

21. Sino Global Capital Management LLC (“SG Capital Management”), referenced in some of Plaintiffs’ prior legal briefs, is a legally distinct entity that is not a direct or indirect subsidiary of SG Capital Limited. SG Capital Limited does not exercise operational control over SG Capital Management.

SG Capital Limited Was Not Involved With Liquid Value Fund I

22. The Complaint in this litigation contains many allegations concerning Liquid Value Fund I. SG Capital Limited played no operational role in Liquid Value Fund I.

declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 21, 2024

By: Matthew Graham
Matthew Graham